

EXHIBIT 2



XTO--Berkley - A. Arnold.pdf

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E-Signature Summary

E-Signature 1: Allen Eugene Arnold (AA)

April 23, 2020 14:43:08 -8:00 [7E3A4463CBFB] [68.227.104.245]
 Allen_Arnold@xtoenergy.com (Principal) (Personally Known)

E-Signature Notary: Tiffany Thrasher (TNT)

April 23, 2020 14:43:08 -8:00 [088634384D7F] [165.97.32.2]
 tiffany.thrasher@haynesboone.com
 I, Tiffany Thrasher, did witness the participants named above electronically sign this document.





2015, I held the title of Operations and Engineering Manager. In total, I have been with XTO/Exxon since 1982.

3. XTO conducts significant oil and gas operations throughout North Dakota. Among other things, it owned and was the lease operator of a producing oil and gas well located approximately eight miles east of Watford City, North Dakota at a drilling pad known as Ryan 14X-09E (the "Ryan Well"). As owner and lease operator of the Ryan Well, XTO did not rent or loan the Ryan Well to any third-party.

4. On or about June 18, 2016, an explosion and fire occurred at the Ryan Well, injuring or killing several people. XTO made every effort to mitigate the incident upon learning of it on June 18, 2016, including but not limited to, shutting down all operations at the Ryan Well, maintaining security onsite immediately after the incident, and ensuring equipment was not tampered with in preparation for the investigation of the incident. My experience and background provide me, both from an engineering and practical standpoint, with an understanding of how accidents in the oil and gas industry occur. Because of my expertise and background, XTO assigned me to investigate the incident that occurred at the Ryan Well immediately after it occurred.

5. On or about June 19, 2016, the day after the incident, I began my investigation of the Ryan Well incident. During my investigation, I visited the well site where the incident occurred and examined the scene. I also personally spoke with the non-injured contractors that were present when the incident occurred. As part of my investigation, I also assisted and collaborated with Austin Wells and Srinivasa Koneti with T H Hill Associates as part of their investigation that was outlined in the investigation report submitted to the Occupational Safety and Health Administration.



6. Through the investigation, it was determined that the accident occurred when the mechanical snubbing equipment that controlled the tubulars within the well was inadvertently defeated, resulting in the tubulars unexpectedly being ejected from the well and causing the unintended ignition of hydrocarbon gas. The gas was most likely ignited by heat generated by the collision tubing and the elevator slips, which resulted in an instantaneous ignition causing flames to immediately engulf the elevated snubbing basket and workover rig operator stand. My investigation included a post incident examination, forensics testing of the equipment, witness interviews, and review of witness descriptions and information conveyed from the employers of the workers involved in the work at the time of the incident.

7. Daniel Dickout, an employee of subcontractor Colter Energy Services USA, Inc., provided a witness statement describing the explosion and fire at the Ryan Well on June 18, 2016. Attached as Exhibit 2-A is a true and correct copy of Daniel Dickout's witness statement.

8. Lyman Yazzie, an employee of subcontractor Colter Energy Services USA, Inc., also provided a witness statement describing the explosion and fire at the Ryan Well on June 18, 2016. Attached as Exhibit 2-B is a true and correct copy of Lyman Yazzie's witness statement.

9. On June 21, 2017, Tom Jones, an employee of subcontractor Badlands Consulting, LLC, was interviewed by OSHA regarding the Ryan Well incident. Attached as Exhibit 2-C is a true and correct copy of the Tom Jones Interview Statement with OSHA.

10. On May 9, 2017, Ociel Rodriguez, an employee of subcontractor Weatherford U.S. L.P., provided deposition testimony regarding the Ryan Well incident. Attached as Exhibit 2-D is a true and correct copy of Ociel Rodriguez's deposition testimony.

11. OSHA commissioned an investigation through T H Hill Associates to investigate the Ryan Well incident. Attached as Exhibit 2-E is the T H Hill Report dated December 15, 2016.



12. On June 18, 2016 and June 21, 2016, the North Dakota Office of Attorney General Fire Marshal Division also conducted an investigation of the Ryan Well incident. Attached as Exhibit 2-F is a true and correct of the Fire Investigation Report.

13. On December 12, 2017, Carson Dokken, an employee of subcontractor Missouri Basin Well Service Inc., provided deposition testimony regarding the Ryan Well incident. Attached as Exhibit 2-G is a true and correct copy of Carson Dokken's deposition testimony.

14. Based on my investigation, it was determined that the serious burn injuries to three individuals and a fall that fatally injured one person resulted from the explosion and fire described above.



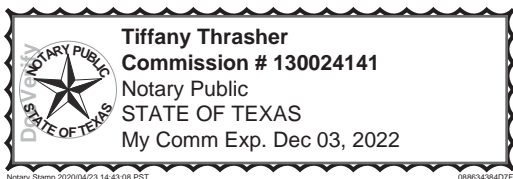
FURTHER, AFFIANT SAYETH NOT.

Allen Eugene Arnold

Signed on 2020/04/23 14:43:08 -8:00

Allen Arnold

Subscribed and sworn to before me this 23rd day of April, 2020.



Tiffany

Signed on 2020/04/23 14:43:08 -8:00

Notary Public

SEAL

